

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x

KENNETH CREIGHTON,

Plaintiff,

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

-against-

1:12-cv-07454-PGG-DCF

THE CITY OF NEW YORK, DETECTIVE DEAN
ROBERTS (Shield No. 05861), DETECTIVE GLENN
GODINO (Shield No. 2756), POLICE OFFICERS JOHN
DOES 1-10 (names being fictitious and presently unknown
and intended to be employees of the NYPD who were
involved in Plaintiff's arrest, detention, imprisonment,
and/or prosecution), DISTRICT ATTORNEY ROBERT T.
JOHNSON, ASSISTANT DISTRICT ATTORNEY
BRUCE BIRNS A/K/A BURNS, ASSISTANT DISTRICT
ATTORNEY ED TALTY a/k/a ED TULTY and
ASSISTANT DISTRICT ATTORNEY MICHAEL
COOPER,

Defendants.

----- x

PLEASE TAKE NOTICE that upon the annexed Declaration of Kavin Thadani,
dated June 27, 2016, and the exhibits annexed thereto; the Local Civil Rule 56.1 Statement,
dated June 27, 2016; the accompanying Memorandum of Law in Support of Defendants' Motion
for Summary Judgment; and all prior pleadings and proceedings had herein, defendants will
move this Court, before the Honorable Paul G. Gardephe, United States District Judge, at the
United States Courthouse for the Southern District of New York, located at 40 Foley Square,
New York, New York 10007, for summary judgment pursuant to Rule 56 of the Federal Rules of
Civil Procedure on the grounds that there are no material issues of fact in dispute that warrant a
trial, and that the defendants are entitled to judgment as a matter of law as to all of plaintiff's
claims, and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, by Order of the Court, opposition papers, if any, shall be served on or before July 11, 2016.

PLEASE TAKE FURTHER NOTICE that, by Order of the Court, reply papers, if any, shall be served on or before July 18, 2016.

Dated: New York, New York
June 27, 2016

ZACHARY W. CARTER
Corporation Counsel of the City of New York
Attorney for Defendants
100 Church Street
New York, New York 10007
(212) 356-2351

By:



Kavin Thadani
Senior Counsel
Special Federal Litigation Division

TO: **VIA HAND DELIVERY AND EMAIL**
Richard Gross, Esq.
Michael Jaffe, Esq. (via email only)
Attorneys for Plaintiff